

DEPT. OF TRANSPORTATION

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To Whom It May Concern:

The impact on operators if RVSM is implemented will be devastating. The cost for operators to modify their aircraft alone will be enough to force many to terminate their businesses. The economic loss of equity in equipment that can not be modified and certified to RVSM standards will be into the billions of dollars.

RVSM is not a solution to air traffic congestion. The congestion in the current air traffic system is the approach and terminal areas. Therefore, by increasing traffic in the enroute segments of airspace, the arrival and terminal areas will not be able to accommodate the increased flow. With the current status of airports in the United States continually being threatened to be closed by surrounding neighborhoods because of noise, traffic and other factors related to operations of aircraft. Air traffic control frequently slows traffic several hundred miles from their destination due to flow into the approach and terminal areas.

There are several makes, models and generation of business jets that will not be able to comply with the requirements of RSVM due to the fact that their current systems will not comply with or the cost to upgrade that particular aircraft will not be economical to install and certify. Many of the planes could fly at lower altitudes; however, the cost of range operation would increase significantly due to the tremendous amount of fuel burned in the lower altitudes. If operators chose to operate these aircraft at low altitudes, it would increase the traffic at the lower flight levels where there is already 1000-foot vertical separation without any aircraft having to be certified to RVSM standards. Part of the justification is to reduce fuel used.

In conclusion, I feel that a more cost effective approach to increasing the capacity of domestic airspace is simply more runways to relieve the current congestion in the approach and landing environments. When the airports can handle more traffic, the efficacy to implement RVSM may be prudent but in the current state of our enroute airspace system, RVSM is not equitable.

Sincerely,

  
Ladd Klinglesmith